

LAW OFFICES
WILLIAMS & CONNOLLY^{LLP*}

KATHERINE A. TREFZ
(202) 434-5038
ktrefz@wc.com

680 MAINE AVENUE SW
WASHINGTON, DC 20024
(202) 434-5000
WWW.WC.COM

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

May 5, 2025

Via ECF

Hon. Jessica G. L. Clarke
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
Courtroom 11B
New York, NY 10007-1312

Re: United States v. Peraire-Bueno, Case No. 1:24-cr-00293; Defendants' Intent to
File Opposition to Government's Motion for Reconsideration

Dear Judge Clarke:

On Thursday, May 1, the government filed as a letter-motion (D.E. 83) a Motion for Reconsideration of the Court's April 17, 2025 order scheduling a *Franks* hearing (D.E. 82). Defendants James Peraire-Bueno and Anton Peraire-Bueno provide notice that, unless the Court orders otherwise, they intend to file an Opposition to the government's Motion by May 15, 2025, the deadline set by Local Criminal Rule 49.1.

Sincerely,

/s/ Katherine Trefz

Katherine Trefz (*pro hac vice*)
Daniel Shanahan (*pro hac vice*)
Patrick Looby (*pro hac vice*)
Williams & Connolly LLP
680 Maine Ave., S.W.
Washington, D.C. 20024
Tel: 202-434-5000
ktrefz@wc.com
dshanahan@wc.com
plooby@wc.com

Jonathan P. Bach
Shapiro Arato Bach

WILLIAMS & CONNOLLY^{LLP}
Defendants' Notice of Intent to Oppose D.E. 83
May 5, 2025
Page 2

1140 Avenue of the Americas
17th Floor
New York, NY 10036
Tel: 212-257-4897
jbach@shapiroarato.com

*Attorneys for Defendant
James Peraire-Bueno*

/s/ Daniel Marx

Daniel N. Marx
William W. Fick (*pro hac vice*)
Fick & Marx LLP
24 Federal Street, 4th Floor
Boston, MA 02110
Tel: 857-321-8360
dmarx@fickmarx.com
wfick@fickmarx.com

*Attorneys for Defendant
Anton Peraire-Bueno*